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Attorneys for Defendants Oregon Youth Authority,
John Malone, Shannon Moshofsky, Stacey Varner,
Daniel Berger, Tara Williams and Lara Doregios

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

PAUL GALM, personal representative for the
estate of DYLLAN NANOSKI,

Plaintiff,

v.

STATE OF OREGON, by and through the
Oregon Youth Authority; JOHN MALONE, in
his individual capacity; SHANNON
MOSHOFSKY in her individual capacity;
STACEY VERNER in her individual capacity;
GILBERTO DE JESUS-RENTAS, in his
individual capacity; DANIEL BERGER, in his
official and individual capacity; TARA
WILLIAMS in her individual capacity; and
LARA DOREGIOS, in her individual
capacity,

Defendants.

Case No. 3:23-cv-00962-SB

JOINT RULE 26(F) CONFERENCE REPORT
AND LR 16 PROPOSED DISCOVERY
PLAN

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, the parties certify that on October 16, 2023, they held an initial conference of counsel for discovery planning.

1. Initial Disclosures. The parties agree to waive initial disclosures.
2. Discovery Plan. The parties stipulate and agree to the following discovery and pre-trial deadlines

26(f) conference; discovery opens	October 16, 2023
Defendant Gilberto De-Jesus Rentas Answer Due	December 29, 2023
Joinder of claims and parties pursuant to Fed. R. Civ. P. 18 & 19	April 1, 2024 or as otherwise stipulated by the parties or permitted by the court.
File all pleadings pursuant to Fed. R. Civ. P. 7(a) and 15	June 28, 2024 or as otherwise stipulated by the parties or permitted by the court.
Plaintiff's Proposed Expert Disclosure Deadlines: All parties identify experts and provide expert reports All parties provide rebuttal expert reports (if any)	 August 28, 2024 September 25, 2024
Defendants' Proposed Expert Disclosure Deadlines: Close fact discovery Plaintiff provides expert reports Defendants' provide expert reports All parties provide rebuttal expert reports (if any) Close expert discovery	 July 29, 2024 August 28, 2024 September 11, 2024 September 25, 2024 October 31, 2024
Complete all discovery	October 31, 2024

File all dispositive motions	November 29, 2024
Joint ADR report	December 6, 2024
Joint Proposed Pretrial Order, Motions in Limine, Exhibit Lists, Witness Lists, and Deposition Designations	30 days before trial or as otherwise directed by the court.
Trial Setting	February 2025 Timeframe

3. The parties do not foresee any major discovery issues that will require the Court's attention. There are no significant ESI issues that the parties foresee. A Stipulated Protective Order has been entered already among plaintiff and the State defendants. The parties will further submit a Stipulated Pre-Trial Order sixty days in advance of the trial setting date in this action or as otherwise directed by the court.

4. Defendant Gilberto De Jesus-Rentas was served on August 17, 2023 by way of Waiver of Service of Summons. This was the first notice that Mr. De Jesus-Rentas had of the lawsuit.

5. Defendant Gilberto De Jesus-Rentas suffered a stroke in August 2021 (after the events at issue in this case) and is not able to communicate or fully comprehend this legal action. His mother is his legal Guardian. Her primary language is Spanish. Counsel for Gilberto De Jesus Rentas is in the process of identifying a Guardian Ad Litem (GAL) who speaks English and Spanish to be appointed to assist Mr. De Jesus Rentas in this lawsuit.

Counsel for De Jesus-Rentas received discovery that has been produced so far in this case on October 17, 2023. Counsel for De Jesus-Rentas requests an unopposed extension to file an Answer no later than December 29, 2023. The time is needed in order to find and have

appointed a GAL who speaks Spanish and to review the discovery that has been produced to date.

6. The parties have set aside dates in March 2024 for the initial round of depositions.

/s Nikola Jones

NIKOLA L. JONES, #941013
Of Attorneys for Defendant
Gilberto Jesus-Rentas

/s Jeremiah Ross

JEREMIAH V. ROSS, #105980
Of Attorneys for Plaintiff

/s Todd Marshall

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